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Mr. Stephen Johnson, Administrator
U.S. Environmental Protection Agency
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PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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Subject: Public Comments on the HPV Challenge Program Test Plan for 2-(2-dodecyloxyethoxy)ethyl sulfate (sodium laureth sulfate; CAS No. 3088-3 1-3) by Stepan Company.

The following comments on the HPV Challenge Program test plan for sodium laureth sulfate by Stepan Company are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Sodium laureth sulfate is an alcohol ethoxysulfate used in shampoos, bath products, and hand soaps. It is also used as a scouring, leveling, coupling and foaming agent for textile applications.

We commend the Stepan Company for its thoughtful review of existing data for sodium laureth sulfate and analogous chemicals. As a result, all required HPV endpoints have been fulfilled either with testing completed on sodium laureth sulfate or through the use of testing with structurally analogous alcohol ethoxysulfates (AES). In addition to structural similarity, the Stepan Company's test plan notes similar physical and chemical properties among sodium laureth sulfate and other AES. Sodium laureth sulfate has a low acute oral toxicity in rats, with an LD₅₀ greater than 5000 mg/kg bw. This is consistent with the low acute oral toxicity of AES generally, with LD₅₀'s ranging from 1700 to greater than 5000 mg/kg bw. In addition, no adverse effects have been observed for AES in repeated dose, reproductive and developmental toxicity tests and AES are not mutagenic.

The Stepan Company's use of existing data for sodium laureth sulfate and its analogs is consistent with the HPV Challenge Program's goal of obtaining screening level hazard information, and this approach saves animals' lives by avoiding duplicative tests. Thank you for your attention to these comments. I may be reached at 610-586-3975, or via e-mail at josephm@peta.org.

Sincerely,

Joseph Manuppello
Research Associate
Research & Investigations